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May 25, 2022

**VIA ECF**

Hon. Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

RE: *Gill v. National Football League, et al.*  
Civil Action No. 21-cv-01032 (PAE)

Dear Judge Engelmayer:

Defendants National Football League and NFL Enterprises LLC respectfully submit this letter-motion requesting an extension of time to comply with Your Honor's Order dated May 23, 2022 (Doc. No. 80).

On May 23, 2022, the Court directed the Defendants to file the documents at docket number 70 which are currently under seal with limited redactions. (Doc. No. 80). The Defendants will be filing further redacted versions of the contracts filed under Doc. Nos. 70-2 and 70-3 in compliance with the May 23 Order. The Defendants, however, seek an extension to unseal the contract filed as Doc. No. 70-1 which is a contract between Perform Media Channels Ltd. ("Perform") and NFL International LLC.

The contract between Perform and NFL International LLC contains the following confidentiality provision:

Neither Party shall disclose to any third party any information with respect to the financial or other terms of this Agreement, any matters relating to the course of dealings between the Parties, or any other proprietary information of the other Party ("Confidential Information") except (a) to the extent necessary to comply with any law (including the making of any required filings or recordings), any legal proceedings, or the valid order of a court of competent jurisdiction provided that the Party making such disclosures shall promptly notify the other Party of the disclosure obligation in writing and seek confidential treatment of such information; (b) as part of its reporting or review procedures to its affiliated entities (which includes NFLI's ability to disclose any such information to the Member Clubs and their owners); or (c) in order to enforce the rights granted to a

Party hereunder or to perform its obligations hereunder.

(See page 39 of Doc. No. 70-1).

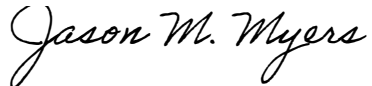
During the course of discovery, the Defendants provided written notification to Perform that the contract will be disclosed subject to a Protective Order (Doc. No. 57) with a “confidential” designation. As the Perform contract has now been ordered to be filed unsealed and on the public docket, the Defendants respectfully request a short extension of time to notify Perform of the disclosure requirement in accordance with the Defendants’ confidentiality obligations.

Accordingly, the Defendants respectfully request that the time to unseal Doc. No. 70-1 be extended to June 3, 2022. As Plaintiff is already in possession of this contract, there would be no delay or prejudice to the briefing schedule or submission of the pending summary judgment motion.

We thank the Court for its attention to this matter.

Respectfully Submitted,

**LONDON FISCHER LLP**

A handwritten signature in black ink that reads "Jason M. Myers". The signature is written in a cursive, flowing style.

Jason M. Myers